



# 2015 ECE TRENDS

COMMON ISSUES AND FIXES

# INTRODUCTION

Over the course of the 2015 ECE cycle, a analysis was done on the most common deficiencies. This is done to identify a root cause and implement changes to orders, ESOPs, or training.

We will go through some of the most common trends from 2015 and what can be done to correct or prevent these deficiencies from happening.



# ADMINISTRATION

1. Personnel that were verbally appointed to environmental billets do not have appointment letters or record of training.
  - Fix - Upon verbal appointment the ECO should generate an appointment letter and open a record of training. If it is a new ECO, the ECC needs to ensure the command generates an appointment letter for the new individual.
  - NOTE: This was so much of a problem leading up to the order update in 2013 that a change was made to allow for the ECO to sign appointment letters for personnel under him.
2. Personnel not trained, or have not received training within 90 days.
  - Fix - Upon appointment of new individuals, have them take required CBTs and submit a request to MSC ECC for a training date, and an alternate. When the ECC confirms the date, print and place the email with the training record until train. Make sure individual has appointment letter and required CBT certificates prior to attending in-class training.

# ADMINISTRATION

## 3. Not conducting, or not documenting, ECO monthly inspections.

- Fix – The obvious fix is to conduct and document monthlies, but sometimes it is not that easy.
  - On top of conducting, ECO must document corrective actions.
  - You have the entire month to conduct the monthly inspection.
  - AECO can conduct in the absence of the ECO.
  - ECC may also fill in if the unit is without a appointed ECO.

## 4. EMS

- Fix – EMD has fillable EMS posters that have all required information, personnel within the command just need to know its location. **ALL** personnel within the command are required to know this information. They should know what to do in the event of a spill, and who their ECO is, without looking at the poster.



# HAZARDOUS MATERIAL (HM) MANAGEMENT

## 1. Service-life expired HM.

- Fix – Ensure that you are using the first in first out method of rotating stock. If HM is approaching expiration, see if other organizations within the command can use. If it reaches expiration, consolidate it for turn-in.

## 2. Not conducting weekly turn-in.

- Fix – Ensure turn-in document is submitted to [lejeune\\_hazmat@usmc.mil](mailto:lejeune_hazmat@usmc.mil) and a date is scheduled for pick-up. Ensure personnel are available at the site so that EMD can gain access to turn-ins. If lift support is needed, ensure that it is locked on for that day.

## 3. No AUL, or AUL not submitted to AUL working group.

- Ensure an AUL is generated and only include those HMs that are approved for use on MCB Camp Lejeune's AHML. Once complete submit AUL to AUL working group at [lejeune\\_AUL@usmc.mil](mailto:lejeune_AUL@usmc.mil).



# **SPILL PREVENTION CONTROLS AND COUNTERMEASURES (SPCC)**

1. ULCPs missing, not specific for the site they are located at, or have not been updated.
  - Fix – Ensure that ULCP is site specific for the area that it pertains to. Ensure the ULCP is placed in an area that can be easily located, and provide training to the personnel that work in the section the ULCP is for. If POCs change, or a specific media is added or removed, the ULCP needs to be updated with that information.
2. **Missing secondary containment, secondary containment is unserviceable, or items not placed on secondary containment.**
  - Fix – For those containers or HM that are equal to or greater than 55 gallons, secondary containment must be provided. Ensure that there are no holes in secondary containment and the drain plugs are installed. Containers need to be placed fully on the containment pad, no part hanging over the side.



## **SPILL PREVENTION CONTROLS AND COUNTERMEASURES (SPCC)**

3. Secondary containment inspections are not being conducted.

- Fix – On a weekly basis inspect and document any deficiencies on EMD Form 25.

4. Not following BMPs.

- Fix – Surface of drums needs to be wiped off and lids need to be closed. Drip pans need be inspected for POL and emptied after a rain event. Leaking equipment should be moved in the bay, or drip pans should be used to captures leaking POLs. Clean up all spill debris after a spill.





# HAZARDOUS WASTE (HW)

1. Weekly SAA inspections are not being conducted.
  - Fix – Ensure that SAA site is inspected and the inspection is documented on Enclosure 6 of MCIEAST-MCBCAMLEJO 5090.9 on a weekly basis.
2. HW found on ground around SAA , or HW is not being fully cleaned up at the point of generation.
  - Fix – This mainly applies to the armory and any site with a blast booth. Ensure that HW is transferred in to the SAA site, any that is dropped during transfer needs to be cleaned up. Ensure area where HW is generated is kept clean as well and all HW is picked up.
3. SAA containers are not be closed when HW is added or removed.
  - Fix – When HW is added to the SAA, or removed during weekly pick-up, ensure the lid on the container is put back on and tightened. Do not cut holes in the lid of the SAA container.





# SOLID WASTE/RECYCLING

1. Solid waste on ground around solid waste receptacles/dumpsters.
  - Solid waste should be contained in solid waste receptacles. Any solid waste on the ground needs to be picked up. If dumpsters are full contact the land fill and see if a pick up can be arranged.
2. Unit not recycling or mixing solid waste with recycling.
  - Unit needs to ensure that recycling is being done in the work sections. If a unit has is supported by MCB Camp Lejeune (i.e. a recycling dumpster or office pick up) those recycling streams should not be disposed of in solid waste receptacles.



# TITLE V (AIR QUALITY)

1. Missing title V binder, not logging usage.
  - Fix – Ensure that Title V binders are located near the source. If source moves, Title V binder should be moved as well. Ensure personnel are entering usage for those sources that usage is required.
2. Registration for ODS equipment missing, or equipment was not registered.
  - For equipment that was, or is believed to be, registered coordinate with ECC to have Air Quality Program Manager check to see if equipment was registered. If equipment is new, coordinate with ECC to have equipment registered.

